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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

CHILDREN'S HEALTH DEFENSE, a Georgia non-
profit organization,

Plaintiff,

v.

FACEBOOK, INC., a Delaware corporation; MARK
ZUCKERBERG, a California resident; SCIENCE
FEEDBACK, a French corporation; THE POYNTER
INSTITUTE FOR MEDIA STUDIES, INC., a
Florida corporation; and DOES 1-20.

Defendants.

Case No.: 3:20-cv-05787-SI

**DEFENDANT THE POYNTER
INSTITUTE FOR MEDIA STUDIES,
INC.'S OPPOSITION TO
PLAINTIFF'S REQUEST FOR
JUDICIAL NOTICE (DKT. NO. 97)
AND REQUEST FOR LEAVE TO
FILE STATEMENT OF RECENT
DECISION (DKT. NO. 98)**

Hon. Susan Illston

1 Defendant, the Poynter Institute for Media Studies, Inc. (“Poynter”), hereby files its
2 opposition to Plaintiff Children Health Defense’s (1) Request for Judicial Notice in Support of
3 Plaintiff’s Opposition to Motions to Dismiss and in Support of Plaintiff’s Motion to Supplement the
4 Pleadings (Dkt. No. 97) and (2) Plaintiff’s Request for Leave to File Statement of Recent Decision
5 (Dkt. No. 98), both filed on May 11, 2021. Poynter adopts and incorporates by reference as if fully
6 set forth herein the arguments made in Defendants Facebook Inc.’s and Mark Zuckerberg’s
7 Opposition to the same (Dkt. No. 99). For the reasons stated therein, Poynter respectfully requests
8 that this Court deny Plaintiff’s procedurally improper and bad faith attempts to supplement the
9 record and present belated and irrelevant legal argument.

10 Dated: May 12, 2021

JASSY VICK CAROLAN LLP

By: /s/ Kevin L. Vick

KEVIN L. VICK

THOMAS & LOCICERO PL

By: /s/ Carol Jean LoCicero

CAROL JEAN LOCICERO

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for Media Studies, Inc.*

SIGNATURE ATTESTATION

I am the ECF User whose identification and password are being used to file the foregoing.
Pursuant to Civil Local Rule 5-1(i), I hereby attest that the other signatures have concurred in this filing.

Dated: May 12, 2021

By: /s/ Elizabeth Baldridge
Elizabeth Baldridge

CERTIFICATE OF SERVICE

I hereby certify that on May 12, 2021, I electronically filed the above document with the Clerk of the Court using CM/ECF which will send electronic notification of such filing to all registered counsel.

Dated: May 12, 2021

By: /s/ Elizabeth Baldridge
Elizabeth Baldridge